

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHIRLEY SYPNIEWSKI,)
)
Plaintiff,)
v.)
) COURT FILE NO. 08 CV 00239
NCO FINANCIAL SYSTEMS, INC., and)
LVNV FUNDING, LLC,) Judge Gettleman
)
Defendant.) Mag. Judge Schenkier
)
)
)

MOTION FOR ENLARGEMENT OF TIME

Defendant, LVNV FUNDING, LLC, by its attorney, Todd P. Stelter, and pursuant to Federal Rule of Civil Procedure 6(b), respectfully request that this court grant a 21 day enlargement of time, or up until March 5, 2008, to file a responsive pleading to Plaintiff's Complaint, and in support thereof, states as follows:

1. Plaintiff's Complaint purports to state a claim under the Fair Debt Collection Practices Act against the defendant.
2. Plaintiff's Complaint was filed on January 10, 2008, and service was recently effectuated on defendant.
3. Defense counsel was recently retained and requires additional time to perform factual investigation prior to answering or otherwise pleading. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response.
4. Defense counsel was unable to communicate with plaintiff's counsel regarding whether there was an objection to this motion as of the time of its filing.

WHEREFORE, defendant, LVNV FUNDING, LLC, respectfully requests this court grant an enlargement of time up to and including March 5, 2008, to file a responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

LVNV FUNDING, LLC

By: _____ s/ Todd P. Stelter _____
One of Its Attorneys

Todd Stelter
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312-704-3000

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CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2008, I electronically filed MOTION FOR ENLARGEMENT OF TIME with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

Daniel Edelman
dedelman@edcombs.com

Respectfully submitted,
LVNV FUNDING, LLC

By: s/Todd P. Stelter
One of its attorneys

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